

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

SALIX PHARMACEUTICALS, INC.,  
SALIX PHARMACEUTICALS, LTD.,  
ALFASIGMA S.P.A. and BAUSCH  
HEALTH IRELAND LTD.,

Plaintiffs,

v.

ZYDUS PHARMACEUTICALS (USA) Inc.  
and ZYDUS LIFESCIENCES LIMITED,

Defendants

Case No.: 1:24-cv-9512

**PLAINTIFFS' MOTION TO COMPEL**

Plaintiffs Salix Pharmaceuticals, Inc., Salix Pharmaceuticals, Ltd., Alfasigma S.p.A, and Bausch Health Ireland Ltd., by their attorneys, Morgan, Lewis & Bockius LLP, respectfully move this Court to compel Defendants Zydus Pharmaceuticals (USA) Inc. and Zydus Lifesciences Limited to (i) identify Rule 30(b)(6) witnesses, topic designations, and dates; and (ii) produce documents responsive to Plaintiffs' Requests for Production.

The grounds for this Motion are set forth in the accompanying Memorandum of Law, which is attached hereto as **Exhibit A** and is incorporated by reference in its entirety. A Proposed Order is attached hereto as **Exhibit B**.

Dated: June 30, 2025

Respectfully submitted,

By: /s/ Harvey Bartle IV

Harvey Bartle IV

(NJ ID No. 028792003)

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Salix Pharmaceuticals, Ltd., and Bausch Health  
Ireland Ltd.*

**CERTIFICATE OF SERVICE**

I, Harvey Bartle IV, do hereby certify that on June 30, 2025, I caused a true and correct copy of Plaintiffs' Motion to Compel, and its accompanying Exhibits, to be served upon all counsel of record via CM/ECF.

/s/ Harvey Bartle IV

Harvey Bartle IV